

EXHIBIT G

From: Beral, Arash
Sent: Friday, February 21, 2025 3:47 PM
To: Kenneth Hsu; Murphy, Michael D.
Cc: Malynn, Todd M.; Chary Weis; Ayesha Rector
Subject: RE: Shakey's Pizza Asia Ventures, Inc. v. PCJV USA, LLC et al., Case No. 2:24-cv-04546-SB-AGR

Good afternoon,

First, Mike, welcome to your new firm. Hopefully it is a good move for you.

Second, Kenny, I'm just now getting to this. Your record is wrong. Long *after* we filed our Joint Rule 26 report and *after* the Scheduling Conference, I reached out to you to discuss a deadline for serving initial disclosures. You and Mike ignored my request. There was no "refusal" by Defendants; if anything, I can use your own email against Plaintiff and say it was *Plaintiff* that refused. I don't like playing games, and this issue could easily have been amicably resolved if you had just reached out to us. We will prepare our initial disclosures and send them to you.

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From: Kenneth Hsu <khsu@ecjlaw.com>
Sent: Friday, February 14, 2025 10:25 PM
To: Beral, Arash <arash.beral@blankrome.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>
Cc: Sandoval, Victor <Victor.Sandoval@BlankRome.com>; Michael D. Murphy <mmurphy@ecjlaw.com>; Chary Weis <cweis@ecjlaw.com>; Ayesha Rector <arector@ecjlaw.com>
Subject: Shakey's Pizza Asia Ventures, Inc. v. PCJV USA, LLC et al., Case No. 2:24-cv-04546-SB-AGR

Arash, Todd,

As you know, early in the action, SPAVI proposed mutually exchanging Initial Disclosures before commencement of discovery, including sometime shortly after the Mandatory Scheduling Conference in early September 2024. Defendants refused to agree to do so on the grounds that "the obligation to exchange initial disclosures [should] be stayed until after the Rule 12 Motions are resolved."

Defendants' refusal has now undermined Rule 26 entirely. (See Notes of Advisory Committee on Rules—1993 Amendment (noting that the initial disclosure process was designed to occur "early in the case to exchange information," and that the "requirement" of "early disclosure, without need for any request," was designed to eliminate one round of discovery as it seeks "four types of information that have been customarily secured early in litigation").) The parties are over eight months into the action and the "Rule 12 Motions" have been resolved. Yet, Defendants have yet to serve, let alone mention, their Initial Disclosures that they insisted the parties delay. At the same time, Defendants insist on serving multiple rounds of discovery requests.

In any event, now that the Court has now ruled on both of the "Rule 12 Motions," the time has come for the parties to serve Initial Disclosures. To that end, attached are SPAVI's Initial Disclosures. We assume Defendants' Initial Disclosures are completed. Please confirm your firm will serve them immediately.

Thank you,
Kenny

Kenneth P. Hsu, Esq.

Partner

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